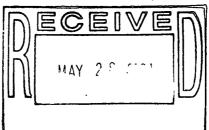


Environmental Restoration
RFCA Standard Operating Protocol
for Routine Soil Remediation
FY04 Notification #04-13
IHSS Group 900-12,
East Trenches





May 2004

**ADMIN RECORD** 

BZ-A-000711



Environmental Restoration
RFCA Standard Operating Protocol
for Routine Soil Remediation
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IHSS Group 900-12,
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Approval received from the U.S. Environmental Protection Agency, Region 8

Approval letter contained in the Administrative Record.

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#### **ACRONYMS**

AL action level

BMP best management practice

BZ Buffer Zone

BZSAP Buffer Zone Sampling and Analysis Plan

CDPHE Colorado Department of Public Health and Environment

COC contaminant of concern

cy cubic yard

D&D Decontamination and Decommissioning

DOE U.S. Department of Energy

EDDIE Environmental Data Dynamic Information Exchange

EPA U.S. Environmental Protection Agency

ER Environmental Restoration

ER RSOP Environmental Restoration RFCA Standard Operating Protocol for

Routine Soil Remediation

FY Fiscal Year IA Industrial Area

IHSS Individual Hazardous Substance Site

ug/kg micrograms per kilogram
mg/kg milligrams per kilogram
nCi/g nanocuries per gram

NFAA No Further Accelerated Action
PCB polychlorinated biphenyl
pCi/g picocuries per gram
pCi/L picocuries per liter

PDF portable document format
POC Point of Compliance
POE Point of Evaluation

RAO remedial action objective

RCRA Resource Conservation and Recovery Act

RFCA or Site Rocky Flats Cleanup Agreement

RFETS Rocky Flats Environmental Technology Site

RSOP RFCA Standard Operating Protocol

SAP Sampling and Analysis Plan
SID South Interceptor Ditch
SSRS Subsurface Soil Risk Screen
SVOC semi-volatile organic compound
VOC volatile organic compound
WRW wildlife refuge worker

#### 1.0 INTRODUCTION

This Environmental Restoration (ER) Rocky Flats Cleanup Agreement (RFCA) Standard Operating Protocol (RSOP) for Routine Soil Remediation (ER RSOP) (DOE 2003a) Fiscal Year (FY) 04 Notification includes the notification to remediate Individual Hazardous Substance Sites (IHSSs) at the Rocky Flats Environmental Technology Site (RFETS or Site) Buffer Zone (BZ) during FY04. The purpose of this Notification is to invoke the ER RSOP for IHSS Group 900-12. Activities specified in the ER RSOP are not reiterated here; however, deviations from the ER RSOP are included where appropriate.

Soil with contaminant concentrations greater than the RFCA action levels (ALs), or as indicated by the Subsurface Soil Risk Screen (SSRS), and associated debris will be removed in accordance with RFCA (DOE et al. 2003) and the ER RSOP (DOE 2003a).

IHSS Group 900-12 is shown on Figure 1. The potential remediation areas covered under ER RSOP Notification #04-13 are listed in Table 1.

Table 1
Potential Remediation Areas for IHSS Group 900-12

IHSS Group	IHSS	COCs	Media	Estimated Remediation Volume
900-12	NE-111.3, Trench T-6	Radionuclides, Metals, Surface and subsurface so		<10 cy
NE-111.5, Hench 1-0		VOCs, SVOCs, and PCBs	and associated debris	
900-12	NE-111.5, Trench T-8	Radionuclides, Metals,	Surface and subsurface soil	<10 cy
		VOCs, SVOCs, and PCBs	and associated debris	

VOCs - volatile organic compounds

SVOCs - semi-volatile organic compounds

PCBs - polychlorinated biphenyls

Five other trenches are present within IHSS Group 900-12 and are not addressed in this Notification. Trenches T-5 (IHSS NE-111.2), T-10 (IHSS NE-111.7), and T-11 (IHSS NE-111.8) will be recommended for NFAA in a separate data summary report. Trenches T-9a and T-9b (IHSS NE-111.6a & b) will be recommended for NFAA in the closeout report that will also address Trenches T-6 and T-8.

#### 2.0 IHSS GROUP 900-12

IHSS Group 900-12 consists of seven trenches (six IHSSs) mentioned in Section 1.0. Contaminants of concern (COCs) at IHSS Group 900-12 are listed in Table 1. The COCs were determined based on process knowledge and data collected during previous studies (DOE 1992-2003, 1996, 2001, 2002a and 2003b).

The East Trenches (T-3 - T-13) are variable in length, with the average length being approximately 250 feet. The trenches are reported to be approximately 10 feet deep and have a two-foot soil cover. The trenches were used during the period from July 29, 1954, through August 14, 1968, based on aerial photographs. The exact dates of operation are unknown. To date, no documentation has been found that records the timeframe during which any particular trench was receiving waste. Similarly, none of the HRR interviewees were knowledgeable on dates of operation of individual trenches.

The East Trenches were used primarily for the disposal of sanitary wastewater treatment plant sludge. The sludge should consist primarily of concentrated organic matter typically present in sanitary wastewater treatment plant sludge. Flattened drums that had contained contaminated oil may have also been disposed in Trenches T-3 through T-11. Other materials were disposed in Trenches T-4, T-9 and T-11, including asphalt planking (approximately 130,000 square feet) from the re-design of Solar Pond 207A in T-4 and T-11 in 1963, and scrap metal and miscellaneous debris in T-9. In addition, an employee recalled that laboratory waste may have been disposed of in Trench T-13.

The East Trenches were open during the early part of the 903 Pad clean up, which began in 1967. The trenches may therefore have received airborne dust contamination from the Pad area or may actually have been used to dispose of contaminated soil from the 903 Pad area until the Trenches were closed in August 1968.

#### 2.1 Project Conditions

Historical and accelerated action soil characterization data for Trenches T-6, T-8, T-9a and T-9b are presented on Figures 2 and 3, respectively. Only data greater than background means plus two standard deviations or method detection limits/reporting limits are presented. Accelerated action characterization activities were planned and executed in accordance with the BZ Sampling and Analysis Plan (SAP) (BZSAP) (DOE 2002a) and BZSAP Addendum #BZ-04-02 (DOE 2003b).

Historical data reveal that one americium-241 activity, two plutonium-239/240 activities, and one chromium concentration exceeded the wildlife refuge worker (WRW) ALs at one location within Trench T-8 (Location 12795) (Table 2 and Figure 2). Exceedances occurred below 3 feet from ground surface and were considerably less than 3 nanocuries per gram (nCi/g).

Accelerated action data reveal WRW AL exceedances at three locations within Trenches T-6, T-8 and T-9a (Table 2 and Figure 3). In Trench T-6, plutonium-239/240 activities exceeded the WRW AL at 0 to 1 foot, 1 to 3 feet, and 3 to 5 feet below ground surface. In Trench T-8, plutonium-239/240 activities exceeded the WRW AL at 0 to 1 feet, 1 to 3 feet, 3 to 5 feet, and 5 - 7 feet below ground surface. Americium-241 activities exceeded the WRW AL at 1 to 3 feet and 3 to 5 feet. In Trench T-9a, the benzo(a)pyrene concentration exceeded the WRW AL at 1 to 3 feet below ground surface. All plutonium activities were considerably less than 3 nCi/g.



# THIS TARGET SHEET REPRESENTS AN OVER-SIZED MAP / PLATE FOR THIS DOCUMENT: (Ref: 04-Rf-00596; JLB-048-04)

# Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation FY04 Notification 04-13 IHSS Group 900-12, East Trenches

**May 2004** 

### Figure 2:

# Trenches T-6, T-8, T-9a and T-9b, Existing Data Greater Than Background Mean Plus Two Standard Deviations, or Method Detection Limits

File: W:\Projects\Fy2003\Trenches\East Trenches\_092503\sub\_trenches.apr

**April 19, 2004** 

**CERCLA Administrative Record Document, BZ-A-000711** 

U.S. DEPARTEMENT OF ENERGY ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

GOLDEN, COLORADO

# THIS TARGET SHEET REPRESENTS AN OVER-SIZED MAP / PLATE FOR THIS DOCUMENT: (Ref: 04-Rf-00596; JLB-048-04)

# Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation FY04 Notification 04-13 IHSS Group 900-12, East Trenches

**May 2004** 

### Figure 2:

# Trenches T-6, T-8, T-9a and T-9b, Accelerated Action Characterization Data Greater Than Background Mean Plus Two Standard Deviations, or Reporting Limits

File: W:\Projects\Fy2003\Trenches\East Trenches\_092503\sub\_trenches.apr

May 17, 2004

**CERCLA Administrative Record Document, BZ-A-000711** 

U.S. DEPARTEMENT OF ENERGY ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

GOLDEN, COLORADO

Table 2
WRW AL Exceedances Within Trenches T-6, T-8 and T-9a

	· VIEVV IED DA	1-0, 1-0 and 1-7a				
Trench	Sampling Location	Depth (ft)	Analyte	Result	WRW AL	Unit
T-6	DA41-001	0 - 1	Plutonium-239/240	237.8	50	pCi/g
T-6	DA41-001	1 - 3	Plutonium-239/240	195.7	50	pCi/g
T-6	DA41-001	3 - 5	Plutonium-239/240	123.2	50	pCi/g
T-8	CZ40-003	0 - 1	Plutonium-239/240	84.6	50	pCi/g
T-8	CZ40-003	1 – 3 .	Americium-241	132.7	76	pCi/g
T-8	CZ40-003	1 - 3	Plutonium-239/240	756.4	50	pCi/g
T-8	CZ40-003	3 - 5	Americium-241	122.0	76	pCi/g
T-8	CZ40-003	3 - 5	Plutonium-239/240	695.4	50	pCi/g
T-8	CZ40-003	5 - 7	Plutonium-239/240	98.8	50	pCi/g
T-8	12795	3 - 8	Americium-241	104.9	· 76	pCi/g
T-8	12795	3 - 8	Chromium	4,600	268	mg/kg
T-8	12795	3 – 8	Plutonium-239/240	642.4	50	pCi/g
T-8	12795	8 - 10	Plutonium-239/240	131.4	. 50	pCi/g
T-9a	CY40-002	1 - 3	Benzo(a)pyrene	4,700	3490	ug/kg

#### 2.2 RFCA SSRS Evaluation

An SSRS is performed when non-radionuclides and uranium are present in soil below 6 inches from the ground surface, when americium-241 and plutonium-239/240 are present below 3 feet from the ground surface, and for soil beneath below-grade structures. Current site conditions are evaluated to determine whether remediation is required by the SSRS. The SSRS will be conducted again after the accelerated action and related confirmation sampling are completed. The accelerated actions taken, sampling results, and a revised SSRS will be documented in the IHSS Group 900-12 Closeout Report.

## Screen 1 – Are contaminant of concern (COC) concentrations less than RFCA Table 3 soil ALs for the WRW?

No. WRW AL exceedances have been detected in subsurface soil within Trenches T-6, T-8 and T-9a, as discussed in Section 2.1 and summarized in Table 2.

# Screen 2 – Is there a potential for subsurface soil to become surface soil (landslide and erosion areas identified on Figure 1)?

No. IHSS Group 900-12 is not located in an area prone to erosion and landslides in accordance with Figure 1 of RFCA Attachment 5 (DOE et al. 2003).

## Screen 3 – Does subsurface soil contamination for radionuclides exceed criteria defined in RFCA Section 5.3 and Attachment 14?

No. Section 5.3(C)(2) requires the removal of soil in the 3- to 6-foot depth interval that contains plutonium at activities that exceed 3 nCi/g (3,000 picocuries per gram [pCi/g])

with an areal extent of contamination that exceeds 80 square meters. As shown in Table 2, plutonium activities do not exceed 3 nCi/g in any of the trench samples.

# Screen 4 – Is there an environmental pathway and sufficient quantity of COCs that would cause an exceedance of the surface water standards?

No. Contaminant migration via erosion and groundwater are the two possible pathways whereby surface water could become contaminated by Trenches T-6, T-8 and T-9a. However, erosion is an insignificant pathway because the trenches are in a flat-lying area not prone to erosion. Runoff from the area flows into the South Interceptor Ditch (SID), via the East Spray Field Interceptor Channel, and then into Pond C-2 (DOE 2003c). Water is monitored upstream of Pond C-2 and prior to discharge from Pond C-2.

With respect to the groundwater pathway, the trenches are located near a hydraulic divide where water may migrate to the north/northeast or to the south/southeast depending on groundwater levels. Most of the time, wells in the vicinity of the trenches, specifically Trenches T-6 and T-8, are dry. In 1992, there was sufficient groundwater in the area for sampling, and samples were collected from nearby wells 8391 and 8591. The samples at these wells contained VOCs at concentrations greater than RFCA groundwater Tier II ALs, but less than RFCA groundwater Tier I ALs. Plutonium-239/240, americium-241, benzo(a)pyrene and chromium (contaminants that exceeded soil WRW ALs) were not detected.

When there is local groundwater and it is flowing to the north/northeast, VOC contamination would be captured by the East Trenches Plume Groundwater Collection and Treatment System. When there is local groundwater and it is flowing to the south/southeast, any contamination would migrate parallel to the 903 Pad and Ryan's Pit plume. This plume has migrated toward the SID and Woman Creek drainage; however, discharge to surface water has not been observed nor is it expected, most notably due to insufficient saturated thickness and periods of dry conditions (DOE 1999). Additionally, recent groundwater data from two plume extent wells located south and near Trenches T-6 and T-8 (Wells 04591 and 10194) indicate no VOC contamination (DOE 2002b). The two wells contained uranium-233/234 and uranium-238 activities that were greater than RFCA Tier II ALs, but less than background levels.

#### 2.3 Remediation Plan

The RSOP Notification remediation plan for IHSS Group 900-12 includes the following objectives:

- Remove soil with non-radionuclide or uranium contaminant concentrations greater than the RFCA WRW ALs to a depth of 6 inches.
- Remove soil with plutonium-239/240 or americium-241 activities greater than the RFCA WRW AL to a depth of 3 feet, or to less than the applicable AL, whichever comes first.
- Once contaminated soil is removed, collect confirmation soil samples in accordance with the BZSAP (DOE 2002a).



Based on the data presented in Table 2 and the SSRS presented in Section 2.2, remediation will involve removal of the first three feet of soil and debris at Sampling Locations CZ40-003 and DA41-001 (Trenches T-8 and T-6, respectively). The excavations will be 5 feet x 5 feet x 3 feet (2.7 cubic yards). Confirmation samples will be collected at the center of each excavation bottom and the center of each side wall, for a total of 10 samples (1 + 4 samples per excavation x 2 excavations). Samples will be analyzed for radionuclides, metals, VOCs, SVOCs, and PCBs. Potential remediation areas are shown on Figure 4.

In accordance with the SSRS, Sampling Locations 12795 (Trench T-8) and CY40-002 (Trench T-9a) do not require remediation. The benzo(a)pryrene (Location CY40-002), americium-241 (Location 12795), chromium (Location 12795), and plutonium-239/240 (Location 12795) exceedances occur in subsurface soil.

However, additional confirmation samples will be collected from the eastern end of Trench 9a, from the first two intervals at one location. Additional samples were recently collected from the first two intervals at two locations within Trenches T-6, T-8 and T-9b. Additional samples were collected from the first two intervals at only one location within Trench 9a (at the western end). The additional samples will be collected near historical sampling location 12295 (see Figure 2) and analyzed for radionuclides, metals, VOCs, SVOCs, and PCBs.

#### 2.4 Stewardship Evaluation

Based on the WRW AL exceedances detected (Table 2) and the ER RSOP (DOE 2003a), portions of Trenches T-6 and T-8 will be remediated (Section 2.3). Figure 4 shows the potential remediation areas (Sampling Locations DA41-001 and CZ40-003 in Trenches T-6 and T-8, respectively).

An additional stewardship evaluation will be performed during remediation using the consultative process and documented in a closeout report for IHSS Group 900-12. A new map of residual contamination will be generated after remediation. The following sections present the stewardship evaluation.

#### 2.4.1 Proximity to Other Contaminant Sources

IHSS Group 900-12 is in the RFETS BZ and is located east of the 903 Pad and the 903 Pad Lip Area, and west of the East Spray Fields.

#### 2.4.2 Surface Water Protection

Surface water protection includes the following considerations:

Is there a pathway to surface water from potential erosion to streams or drainages?

Soil contaminants from IHSS Group 900-12 could migrate to surface water. Runoff from the area flows south into the SID, which discharges into Pond C-2 via Surface Water Monitoring Station SW027 (a RFCA Surface Water Point of Evaluation [POE]) (DOE 2003c). However, erosion in the IHSS Group is not significant (Section 2.2).

#### Do characterization data indicate there are contaminants in surface soil?

Accelerated action soil characterization data indicate that plutonium activities exceed the RFCA WRW AL (Table 2).

Do monitoring results from POEs or Points of Compliance (POCs) indicate there are surface water impacts from the area under consideration?

The nearest RFCA POE is SW027 (DOE 2003c), and americium-241 and plutonium-239/240 activities have exceeded water quality ALs at this monitoring station. However, most of the annual average americium-241 and plutonium-239/240 activities are less than 0.15 picocurie per liter (pCi/L), and neither of the long-term americium and plutonium averages (Water Year 97 - 01) is greater than 0.15 pCi/L. Also, all of the annual average metal concentrations are less than the ALs, and none of the 30-day averages were reportable. This monitoring station receives water from a large part of the Industrial Area (IA) (IA Areas 400, 600, 800 and 900), and surface water quality at the monitoring station cannot be attributable to any single IHSS Group.

# Is the IHSS Group in an area with high erosion potential, based on the 100-Year Average Erosion Map?

IHSS Group 900-12 is not located in an area subject to erosion in accordance with Figure 1 of RFCA Attachment 5 (DOE et al. 2003).

#### 2.4.3 Monitoring

Monitoring includes the following considerations:

## Do monitoring results from POEs or POCs indicate there are groundwater impacts from the area under consideration?

There are groundwater monitoring wells near Trenches T-6 and T-8 (08391 and 08591) as well as plume extent wells south of the two trenches (04591 and 10194). The wells near the two trenches are usually dry. In 1992, there was sufficient groundwater in the area for sampling, and samples were collected. The samples contained VOCs at concentrations greater than RFCA groundwater Tier II ALs, but less than RFCA groundwater Tier I ALs. Plutonium-239/240, americium-241, benzo(a)pyrene and chromium (contaminants that exceeded soil WRW ALs) were not detected. Recent groundwater data from the two plume extent wells indicate no VOC contamination (DOE 2002b). The two wells contained uranium-233/234 and uranium-238 activities that were greater than RFCA groundwater Tier II ALs, but less than background levels.

#### Can the impact be traced to a specific IHSS Group?

Impacts cannot be definitively traced to IHSS Group 900-12.

#### Are additional monitoring stations needed?

The need for and placement of monitoring stations will be re-evaluated in the Long-Term Stewardship Plan.

Can existing monitoring locations be deleted if additional remediation is conducted?



Not applicable. Existing wells monitor potential contamination from areas outside IHSS Group 900-12.

#### 2.4.4 Stewardship Actions and Recommendations

The current stewardship actions and recommendations for IHSS Group 900-12 are as follows:

- Use best management practices (BMPs) to reduce erosion into surface water drainage.
- Implement near-term institutional controls until final closure and stewardship decisions are implemented, including the following:
  - Restrict access; and
  - Control soil excavations through the Site Soil Disturbance Permit process.
- Implement long-term stewardship actions, including the following:
  - Prohibitions on construction of buildings;
  - Restrictions on excavations or other soil disturbance; and
  - Prohibitions on groundwater pumping in the area of IHSS Group 900-12.

These recommendations may change based on in-process remediation activities and other future RFETS remediation decisions.

#### 2.5 Accelerated Action Remediation Goals

ER RSOP remedial action objectives (RAOs) include the following:

- Provide a remedy consistent with the RFETS goal of protection of human health and the environment;
- Provide a remedy that minimizes the need for long-term maintenance and institutional or engineering controls; and
- Minimize the spread of contaminants during implementation of accelerated actions.

#### 2.6 Treatment

Not applicable.

#### 2.7 Project-Specific Monitoring

High-volume air samplers may be used at the remediation area consistent with work controls to determine airborne radioactivity concentrations. Approximate locations of air samplers are shown on Figure 4.

#### 2.8 RCRA Units and Intended Waste Disposition

IHSS Group 900-12 contains no Resource Conservation and Recovery Act (RCRA) units subject to RCRA closure requirements.

#### 2.9 Administrative Record Documents

The following Administrative Record documents pertain to this ER RSOP Notification for IHSS Group 900-12:

DOE, 1992-2003, Historical Release Reports for the Rocky Flats Plant, Golden, Colorado.

DOE, 1996, Draft Trenches and Mound Site Characterization Report, Rocky Flats Environmental Technology Site, Golden, Colorado, September.

DOE, 1999, 903 Pad/Ryan's Pit Plume Project Completion Report, Fiscal Year 1999, Rocky Flats Environmental Technology Site, Golden, Colorado, August.

DOE, 2001, Rocky Flats Environmental Technology Site Buffer Zone Data Summary Report, Golden, Colorado, July.

DOE, 2002a, Buffer Zone Sampling and Analysis Plan, Rocky Flats Environmental Technology Site, Golden, Colorado, June.

DOE, 2002b, First Quarter RFCA Groundwater Monitoring Report for Calendar Year 2002, Rocky Flats Environmental Technology Site, Golden, Colorado, November.

DOE, 2003a, Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation Modification, Rocky Flats Environmental Technology Site, Golden, Colorado, September.

DOE, 2003b, Buffer Zone Sampling and Analysis Plan FY04 Addendum #BZ-04-02, Rocky Flats Environmental Technology Site, Golden, Colorado, November.

DOE, 2003c, Automated Surface-Water Monitoring Report, Water Year 2001, Rocky Flats Environmental Technology Site, Golden, Colorado, September.

DOE, CDPHE, and EPA, 2003, Modifications to the Rocky Flats Cleanup Agreement Attachment, U.S. Department of Energy, Colorado Department of Public Health and Environment, and U.S. Environmental Protection Agency, Rocky Flats Environmental Technology Site, Golden, Colorado, June.

#### 2.10 Projected Schedule

Remediation of IHSS Group 900-12 is expected to begin in third quarter of FY04.

#### 3.0 PUBLIC PARTICIPATION

ER RSOP Notification #04-13 activities will be discussed at the May 2004 ER/Decontamination and Decommissioning (D&D) status meeting. A portable document format (PDF) version of this Notification was provided to the local governments. This Notification is available at the Rocky Flats Reading Rooms and on the Environmental Data Dynamic Information Exchange (EDDIE) Website at <a href="www.rfets.gov">www.rfets.gov</a>.

#### 4.0 REFERENCES

DOE, 1992-2003, Historical Release Reports for the Rocky Flats Plant, Golden, Colorado.

DOE, 1996, Draft Trenches and Mound Site Characterization Report, Rocky Flats Environmental Technology Site, Golden, Colorado, September.

DOE, 1999, 903 Pad/Ryan's Pit Plume Project Completion Report, Fiscal Year 1999, Rocky Flats Environmental Technology Site, Golden, Colorado, August.

DOE, 2001, Rocky Flats Environmental Technology Site Buffer Zone Data Summary Report, Golden, Colorado, July.

DOE, 2002a, Buffer Zone Sampling and Analysis Plan, Rocky Flats Environmental Technology Site, Golden, Colorado, June.

DOE, 2002b, First Quarter RFCA Groundwater Monitoring Report for Calendar Year 2002, Rocky Flats Environmental Technology Site, Golden, Colorado, November.

DOE, 2003a, Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation Modification, Rocky Flats Environmental Technology Site, Golden, Colorado, September.

DOE, 2003b, Buffer Zone Sampling and Analysis Plan FY04 Addendum #BZ-04-02, Rocky Flats Environmental Technology Site, Golden, Colorado, November.

DOE, 2003c, Automated Surface-Water Monitoring Report, Water Year 2001, Rocky Flats Environmental Technology Site, Golden, Colorado, September.

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